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13
14 **UNITED STATES BANKRUPTCY COURT**
NORTHERN DISTRICT OF CALIFORNIA
15 **SAN FRANCISCO DIVISION**

16 **In re:**

17 **PG&E CORPORATION**

18 **- and -**

19 **PACIFIC GAS AND ELECTRIC
COMPANY,**

20 **Debtors.**

- 21
22 ☐ Affects PG&E Corporation
23 ☐ Affects Pacific Gas and Electric Company
24 ☒ Affects both Debtors

25 *All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

) Bankruptcy Case
) No. 19-30088 (DM)

) Chapter 11

) (Lead Case)

) (Jointly Administered)

) **STIPULATION AND AGREEMENT FOR**
) **ORDER ADDING THE UNITED STATES OF**
) **AMERICA AS PARTIES TO**
) **CONFIDENTIALITY AND PROTECTIVE**
) **ORDER [DOCKET NO. 3405] AS MODIFIED**
) **HEREIN**

) [No hearing requested]

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is entered
2 into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and debtors in possession
3 (collectively, the “**Debtors**”), on the one hand, and the United States of America, on behalf of the United
4 States Department of Agriculture, United States Forest Service; the United States Department of the
5 Interior, Bureau of Land Management, Bureau of Indian Affairs, Fish and Wildlife Service, and the
6 National Park Service; the Small Business Administration, and the Department of Homeland Security,
7 Federal Emergency Management Agency (together, the “**U.S. Agencies**”), on the other hand. The Debtors
8 and the U.S. Agencies are referred to in this Stipulation and Agreement for Order collectively as the
9 “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate and agree as follows:

10 **RECITALS**

11 A. The U.S. Agencies desire to be parties to the Confidentiality and Protective Order entered
12 by the United States Bankruptcy Court for the Northern District of California on August 7, 2019 in *In re*
13 *PG&E Corp., et al.*, Case No. 3:19-bk-30088 at Docket No. 3405 (the “**Order**”), with certain
14 modifications, to which the Debtors have agreed.

15 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
16 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
17 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
18 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER, THAT**
19 **THE ORDER BE MODIFIED AS FOLLOWS:**

- 20 1. Treatment of Protected Material by the United States. Nothing in the Order supersedes the U.S.
21 Agencies’ law enforcement, national security, or regulatory obligations regarding the disclosure
22 of information required by applicable federal law.
- 23 2. Freedom of Information Act Requests. The provisions of paragraph 8 of the Order shall apply to
24 requests made to the U.S. Agencies pursuant to the Freedom of Information Act, 5 U.S.C. § 552,
25 et seq.
- 26 3. Congressional Requests. The Order shall not prevent or limit the U.S. Agencies’ ability to provide
27 Protected Material to the United States Congress pursuant to a Congressional request. The United
28 States will use reasonable efforts to notify the Designating Party of such request if, and only if, the
requesting Congressional party does not object to such notification.

1 Dated: November 12, 2019

2 KELLER & BENVENUTTI LLP

THE UNITED STATES OF AMERICA

3
4 /s/ Jane Kim

Jane Kim

5
6 *Attorneys for Debtors
and Debtors in Possession*

/s/ Danielle A. Pham

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